

EXHIBIT

19

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, et al.)	
)	
Plaintiffs,)	
)	
vs.)	05-CV-0329 TCK-SAJ
)	
TYSON FOODS, INC., et al ,)	
)	
Defendants.)	

**TYSON FOODS, INC.'S RESPONSE TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES**

COMES NOW Defendant TYSON FOODS, INC (hereinafter referred to as "Defendant" or "Tyson Foods"), and for its responses to Plaintiff's First Set of Interrogatories to Defendant Tyson Foods, Inc. states as follows:

GENERAL OBJECTIONS

1 Each of the following responses is made without waiving any objections Defendant may have with respect to the subsequent use of these answers or any documents identified in response to these requests.

2 Tyson Foods objects to, and does not agree to, or agree to subject itself to, the arbitrary and extraordinary "definitions" ascribed by the Plaintiff to certain terms as set forth in its First Set of Interrogatories. Tyson Foods instead ascribes to the ordinary, every day and reasonably, commonly understood meanings which apply to such terms, and also which comply with the Federal Rules of Civil Procedure. Tyson Foods objects to the definitions to the extent they assume facts not in evidence or related to facts or contentions in dispute in the action. Tyson Foods also specifically objects to the Plaintiff's definition of "Defendant" as it is overly

broad and includes within its scope "Contract Growers" Tyson Foods submits these answers and responses for itself and not for any other person or entity

3. Tyson Foods specifically reserves the following: (1) all questions and objections as to the competency, relevance, materiality and admissibility of any documents identified in response to these requests; (2) the right to object to the use of these responses or information disclosed herein in any hearing in this proceeding or in any subsequent suit or proceeding; (3) the right to object to other discovery procedures involving or relating to these responses or information disclosed herein; and (4) the right, at any time, upon proper showing, to revise, correct or clarify any of the responses set forth herein.

4 Tyson Foods objects to any purported requirements of Plaintiff's discovery requests that are beyond the requirements of the Federal Rules of Civil Procedure.

5 Tyson Foods objects to any discovery request that seeks a response, document, information or items covered by the attorney-client privilege, the "work product" doctrine and/or any matters prepared in anticipation of litigation or for trial by or for Tyson Foods or its agents

6 Tyson Foods objects to any discovery request that seeks a response that would disclose mental impressions, conclusions, opinions or legal theories of any representative of or attorney for Tyson Foods concerning this lawsuit.

7 Tyson Foods also incorporates as though fully restated herein all objections and limitations to responses made by every other defendant to the corresponding interrogatories.

These General Objections are incorporated in Tyson Foods' responses as if specifically set forth therein. Stating specific objections to a particular discovery request does not in any way waive the General Objections

INITIAL STATEMENT

The following responses and objections are based upon facts now known. Tyson Foods has not yet completed discovery in this matter and therefore will supplement these responses and objections to the extent required by the Federal Rules of Civil Procedure.

INTERROGATORIES

INTERROGATORY NO. 1:


For each of your poultry growing operations in the IRW since 1952, please provide the following information:

- a. name and physical location of the operation;
- b. dates of operation;
- c. type of operation (breeder, broiler, layer, etc.);
- d. number of birds (aggregated annually) at each location; and,
- e. name of the owner and operator

RESPONSE TO INTERROGATORY NO. 1: Tyson Foods objects to Interrogatory No. 1 as it is overly broad in scope, and time and therefore overly burdensome. Tyson Foods does not possess information sufficient to answer Interrogatory No. 1 as it seeks information extending back to 1952. Tyson Foods further objects to the time period of Interrogatory No. 1 as it seeks information that is neither relevant to Plaintiff's claims nor is Interrogatory No. 1 likely to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections and its General Objections, Tyson Foods refers Plaintiff to its Initial Disclosures, which identifies all of the poultry growers in the Illinois River Watershed who were under contract with Tyson Foods for the time period of 2002 to the present. Tyson Foods will produce records relating to those growers at a mutually agreeable time and place.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby state that I have caused to be served via first class U.S. Mail, a true and correct copy of the above and foregoing, on this 22nd day of May 2006, to:

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